

Havant Borough Council  
Development Control  
Civic Offices Civic Centre Road  
Havant  
Hampshire  
PO9 2AX

**Our ref:** HA/2025/126629/01-L01  
**Your ref:** APP/25/00162  
**Date:** 08 April 2025

Dear Sir/Madam

**FLOOD AND COASTAL EROSION RISK MANAGEMENT SCHEME COMPRISING A COMBINATION OF RAISED EARTH EMBANKMENTS, RAISED FOOTPATHS/CYCLEWAYS, SHEET PILED SEA/FLOOD DEFENCE WALLS WITH CLADDING AND FLOOD GLASS, PROVISION OF FLOOD GATES, ASSOCIATED LANDSCAPING AND LANDSCAPING IMPROVEMENTS (INCLUDING STREET FURNITURE), TREE WORKS AND TREE REMOVALS, REALIGNED SECTIONS OF CYCLEWAY/WALKWAY, HIGHWAY ALTERATIONS AND IMPROVEMENTS, ECOLOGICAL IMPROVEMENTS AND TEMPORARY COMPOUNDS AND ACCESS, AND ALL ASSOCIATED WORKS. THE PROPOSAL CONSTITUTES EIA DEVELOPMENT.**

#### **LAND AND COAST ADJACENT TO, LANGSTONE ROAD, HAVANT**

Thank you for the consultation on the above application, please quote our reference on all correspondence.

#### **Environment Agency position**

The proposed development will only meet the National Planning Policy Framework's requirements if the following planning condition is included.

**The development shall be carried out in accordance with the submitted flood risk assessment (ref: *Appendix J1 Coastal Processes Study (Jan 2019), Appendix J2 Technical Note Review of Extreme Water Levels & Sea Level Rise Guidance (Aug 2020), Appendix J3 Modelling Narrative Report (Dec 2020), Appendix J4 Hydrodynamic Modelling Report (Feb 2022) and Appendix J5 Overtopping Report (June 2022)*) and the following mitigation measures it details.**

- **The existing flood defences shall be improved as outlined in (ref: *APP\_25\_00162-MODEL\_SECTIONS\_COMBINED-2089311* and**

Environment Agency  
Canal Walk, ROMSEY, Hampshire, SO51 7LP.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

**These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.**

**The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.**

**Reason(s)**

- To ensure the structural integrity of the existing and proposed flood defences thereby reducing the risk of flooding

**The development hereby permitted must not be commenced until such time as a Construction and Environmental Management Plan has been submitted to, and approved in writing, by the local planning authority and in consultation with the Environment Agency. A CEMP should be submitted demonstrating that the existing standard of protection is not reduced whilst the works take place. The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.**

- The existing standard of protection is not reduced whilst the works take place.

**These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.**

**The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.**

**Reason(s)**

- To ensure the standard of protection is not reduced while constructing the flood defences thereby reducing the risk of flooding.

**Advice to the Applicant/LPA**

The proposed flood risk management infrastructure is intended to reduce the risk of tidal flooding to the properties at risk. However, flood defences cannot eliminate risk completely and a residual risk of flooding from breach, overtopping and/or events of a greater magnitude than that designed for will remain. The Overtopping Report (Appendix J5) shows that once the proposed scheme has been completed, the average overtopping discharge on some of the scheme frontages are predicted to be slightly above the tolerable limits recommended in the EurOtop II Manual. This could pose a safety risk to people behind the defences, particularly towards the end of the design life of the scheme when these residual risks will increase due to climate change.

As the defences will significantly reduce the overall level of tidal flood risk, we are not objecting to the proposed application. Awareness and appropriate management of the residual risk is, however, important. The following aspects should be considered:

We have not reviewed the Drainage Strategy as we are not a statutory consultee on surface water drainage. The Lead Local Flood Authority must be satisfied that the measures proposed to manage surface water flooding, including the runoff created by wave overtopping, are satisfactory.

The Overtopping Report (Appendix J) suggests that Property Flood Resilience measures may still need to form part of the overall flood risk management strategy (p.19). Clarity around which frontages this would apply to would be useful for property owners.

Public safety behind sections of defence that may experience overtopping in excess of tolerable limits should be given consideration, and any necessary mitigation measures put in place.

The above points should be considered in the context of the pre- and post- development situation; the flood risk from tidal inundation is the primary driver behind delivery of the scheme and we would reiterate the level of reduction in overall risk that will occur as a result.

The PDAS recognises the risk that both airborne and underwater noise and vibration impacts pose during the construction of the proposed scheme. Noise generated by mobile plant on the foreshore haul routes, excavators and through the installation of sheet piles have the potential to impact mammals, fish, shellfish and benthic ecology. We are satisfied that the proposed mitigation as detailed in section 8.6.2 ES will help to minimise any impacts noise will have during the construction phase of this proposal.

The scheme recognises the importance of the SPA habitats (extensive mudflats, sandflats and associated saltmarshes, eelgrass beds, coastal grazing marsh and shingle ridges and islands) for overwintering and breeding bird species. Most of the constraints related to birds are linked to the potential for visual and noise impacts during construction. Section 4.2.2.3 PDAS recognises the effects noise can have on the integrity of SPA's, and we are satisfied with the visual and noise disturbance mitigation measures as set out in chapter 10 ES and section 9.1.1 Construction Noise Assessment. We particularly welcome the proposed timings included for overwintering birds in section 2.1 CEMP.

The PDAS recognises the impacts that the proposal will have regarding the temporary loss of habitat for non-breeding/overwintering birds and breeding seabirds and are satisfied with the mitigation measures set out in chapter 10 ES.

We are disappointed that the scheme will result in the temporary loss of/disturbance to the intertidal sediment and saltmarsh habitats, as detailed in section 4.2.1 of the PDAS, however, we are satisfied that the mitigation measures set out in section 8.6.1 ES will minimise any temporary habitat loss/disturbance.

The Langstone FCERM Scheme recognises that there will be unavoidable elements of encroachment into the foreshore/intertidal sediment habitat on the Eastern side of the scheme and that the new defences will result in the permanent loss of this habitat type (172m<sup>2</sup>) under the footprint of the new structures. Section 8.7.2 ES has considered the loss of this habitat and compensation has been approved by the Secretary of State via the Solent and South Downs Habitat Compensation and Restoration Programme (HCRP).

We welcome that the applicant has identified opportunities to create additional saltmarsh on the Western side scheme with a mix of maritime grassland seed sowing and the re-alignment of a footpath to allow space for rollback of saltmarsh with sea level rise. The Langstone FCERM also recognises the rarity of golden Samphire and proposes to translocate existing and plant additional plants.

Section 4.2.2.2 PDAS recognises the importance of the area for protected and terrestrial species. We welcome the proposed habitat creation and improvements as summarised in chapter 9 PDAS to benefit species such as bats, reptiles, breeding birds, and invertebrates.

The scheme recognises a minimum increase in BNG of 10%. We welcome that the Langstone FCERM Scheme has put considerable effort into designing a scheme that aspires to a BNG increase more than 10%.

### **Environmental permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Yours faithfully

**Miss Suz Greenwood**  
**Planning Advisor, Environment Agency**

Direct dial 02084745098

Direct fax

Direct e-mail [suz.greenwood@environment-agency.gov.uk](mailto:suz.greenwood@environment-agency.gov.uk)